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Attorneys for Defendant
American Council of Learned Societies

**UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY**

| | |
|-----------------------------|---|
| -----X | |
| JOSHUA KATZ, | : |
| | : |
| Plaintiff, | : |
| | : |
| - v. - | : |
| | : |
| AMERICAN COUNCIL OF LEARNED | : |
| SOCIETIES, | : |
| Defendant. | : |
| | : |
| | : |
| | : |
| | : |
| -----X | |

**Civil Action No. 1:21 CV 04306
(AET)**

**DECLARATION OF MICHAEL F. BUCHANAN IN SUPPORT OF
MOTION TO DISMISS OF AMERICAN COUNCIL OF LEARNED
SOCIETIES**

MICHAEL F. BUCHANAN pursuant to 28 U.S.C. § 1746, hereby
declares as follows:

1. I am a member in good standing of the bar of the State of New Jersey
and of the law firm of Patterson Belknap Webb & Tyler LLP, attorneys for

Defendant American Council of Learned Societies (“ACLS”). I submit this declaration in support of ACLS’s Motion to Dismiss.

2. Attached as Exhibit 1 is a true and correct copy of a February 19, 2020 letter sent by ACLS President Joy Connolly to Plaintiff Joshua Katz.

3. Attached as Exhibit 2 is a true and correct copy of a March 9, 2020 letter sent by Plaintiff Joshua Katz to ACLS President Joy Connolly.

4. Attached as Exhibit 3 is a true and correct copy of email correspondence on September 14, 2020 between ACLS President Joy Connolly and Plaintiff Joshua Katz.

I declare under penalty of perjury that the foregoing is true and correct.

Dated: April 2, 2021

/s/ Michael F. Buchanan
Michael F. Buchanan

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CERTIFICATE OF SERVICE

I, Michael F. Buchanan, hereby certify, pursuant to 28 U.S.C. § 1746, that on April 2, 2021, I electronically filed the foregoing Declaration of Michael F. Buchanan in Support of Motion to Dismiss of American Council of Learned Societies with the Clerk of Court using the CM/ECF system, which will automatically send e-mail notification of such filing to all counsel of record.

Dated: April 2, 2021

By: /s/ Michael F. Buchanan
Michael F. Buchanan (NJ 049041992)
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